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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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IN THE MATTER OF

ELIGIBILITY FOR THE SPECIALIZED MOBILE
RADIO SERVICES AND RADIO SERVICES
IN THE 220-222 MHZ LAND MOBILE BAND
AND USE OF RADIO DISPATCH
COMMUNICATIONS

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GN DOCKET NO. 94-90

TO THE COMMISSION:

REPLY COMMENTS OF SOUTHWESTERN BELL CORPORATION

ROBERT M. LYNCH
MARY W. MARKS
175 E. HOUSTON
ROOM 1262
SAN ANTONIO, TX 78205
(210) 351-3478

COUNSEL FOR SOUTHWESTERN BELL
CORPORATION

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SUMMARY

Southwestern Bell Corporation ("SBC") submits these Reply Comments in support of the Commission's proposal to eliminate certain eligibility restrictions for wireless services, including SMR land mobile radio and the 220-222 MHz band, and radio dispatch communications.

The commenting parties, including SMR providers and industry groups, almost unanimously supported the Commission's tentative conclusion to eliminate the restriction on wireline ownership of SMR licenses. The record was similarly overwhelming with respect to wireline eligibility to provide 220-222 MHz service. The parties strongly contend that this modification of the eligibility rules for these services will enhance competition in the markets.

Furthermore, the record in this proceeding establishes that existing regulatory safeguards, short of full structural separation requirements, are sufficient to guard against any discriminatory or anticompetitive behavior on the part of wireline carriers in the provision of SMR or 220-222 MHz radio service.

Finally, the overwhelming majority of commenting parties agree with the Commission's proposal to eliminate the eligibility restriction on common carrier provision of dispatch services. The public will benefit from the

competition that could be provided by wireless service providers that can bring new, efficient dispatch services to the market.

SBC urges the Commission to act expeditiously in adopting the proposals set forth in the Notice of Proposed Rulemaking.

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In the Matter of)
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Eligibility for the Specialized Mobile)
Radio Services and Radio Services) GN Docket No. 94-90
in the 220-222 MHz Land Mobile Band)
and Use of Radio Dispatch)
Communications)

To the Commission:

REPLY COMMENTS OF SOUTHWESTERN BELL CORPORATION

Southwestern Bell Corporation ("SBC") hereby submits these Reply Comments in the referenced proceeding. In this proceeding, the Commission undertakes a comprehensive review of existing rules that prohibit certain common carriers from participating in the provision of various wireless services, including specialized mobile radio (SMR), land mobile radio services in the 220-222 MHz band and radio dispatch communications. The resulting record overwhelmingly supports the immediate elimination of these prohibitions. SBC therefore urges the Commission to act expeditiously on these issues, certain of which have been before this Commission since 1986.

I. **THE RECORD OVERWHELMINGLY SUPPORTS ELIMINATING THE PROHIBITION ON WIRELINE OWNERSHIP OF SMR LICENSES AND WIRELINE PROVISION OF RADIO SERVICES IN THE 220-222 MHZ LAND MOBILE RADIO BAND**

With the exception of a single commenting party,¹ all parties concur with the Commission's tentative conclusion to lift

¹Comments were filed by 31 parties, including wireline and wireless service providers, resellers and related associations.

the ban on wireline ownership of SMR licenses. Because of the virtual unanimous support for eliminating the ban, SBC will not repeat the comments of those parties currently restricted from offering SMR service, but does wish to highlight certain of the arguments made by existing providers of SMR service--providers who now agree that the time has come to eliminate a ban which has outlived any perceived or actual usefulness.

For instance, one of the largest associations representing the SMR industry, the American Mobile Telecommunications Association ("AMTA"), indicates (at pp. 5, 6) that large scale change in the type and number of licensees providing SMR service, coupled with recent regulatory developments, has diminished the need to protect most licensees from large "players" such as the RBOCs and LECs. AMTA agrees with the Commission's suggestion that the addition of these entities to the SMR industry could now enhance, rather than hurt, competition. In similar comments, the National Association of Business and Educational Radio ("NABER"), which represents private industry spectrum users, agrees (at p. 4) with the Commission that the risk of competitive harm from wireline carriers using SMR frequencies has diminished as the service has become established and frequencies have become utilized. NABER points out that it would be difficult for wireline carriers to acquire a significant portion of spectrum except through consolidation. Even individual providers of SMR service, such as Geotek Communications and Nextel Communications, support

elimination of the ban.²

With regard to the comments of the lone dissenting party, SMR WON, that the wireline industry should not be given greater eligibility in this competing sector while it remains intransigent on entry issues affecting its own core business³, the FCC should not continue to enforce a prohibition on the basis of irrelevant arguments of a single commenting party. The attempt of SMR WON to tie the market position of a LEC's wireline service to its eligibility to provide a wireless service in a competitive market is unfounded, inappropriate and should be rejected. Moreover, the record is replete with comments arguing that wireline participation in the SMR market will increase, rather than impede, competition in this market to the ultimate benefit of the public.⁴ The Commission should not turn its back on the compelling evidence offered by a majority of parties.

Moreover, SMR WON's allegation (at p. 17) that FCC cases and rulemakings are full of instances where wireline

²Geotek argues (at p. 2) that the basis for continuing the wireline prohibition on holding SMR licenses no longer exists in today's marketplace. Nextel (at p. 4) supports elimination of the ban by pointing out that wireless services have undergone such a dramatic change that the FCC's initial concerns are no longer significant, and the passage of the Budget Act and the FCC's Second R&O (in docket 93-252) have eliminated the basis for continuing the prohibition.

³See SMR WON, p. 10.

⁴See BellSouth at pp. 1, 2; Pacific Bell, Nevada Bell and Pacific Bell Mobile Services at p. 3; Century Telephone at p. 5; East Otter Tail at pp. 2, 3; Polar Communications at p. 5; TDS at pp. 4, 5; SNET Mobility at pp. 5, 6; AMTA at pp. 5, 6; RAM Mobile Data at p. 2; NYNEX at p. 4.

telephone providers have discriminated on interconnection is totally unsupported and, in fact, unsupportable. Not only does current experience involving interconnection practices between local exchange carriers and wireless providers disprove this allegation,⁵ but any potential concerns over discriminatory interconnection practices by the LECs have been mooted by the provisions of the 1993 Omnibus Budget Reconciliation Act ("Budget Act") and the FCC's Second R&O (in GN Docket 93-252) that requires LECs to provide reasonable, nondiscriminatory interconnection to all CMRS providers.⁶ Therefore, the argument of SMR WON should simply be rejected by the Commission as being unsupported and without merit.

Lastly, the record developed in this proceeding with regard to wireline eligibility in the provision of 220-222 MHz Land Mobile Radio Service (220 MHz radio service) is no less persuasive than the record pertaining to elimination of the wireline prohibition on SMR service. For all of the same reasons stated by commenters in support of eliminating the wireline eligibility prohibition on SMR licenses, the ban on wireline eligibility for the 220 MHz radio service should be eliminated as well. Only one party, AMTA, attempts to draw a distinction

⁵See East Otter Tail at p. 6; CTIA at pp. 13, 14.

⁶The LECs' obligation to provide nondiscriminatory interconnection pursuant to legislative and regulatory mandate was mentioned as a necessary and worthwhile safeguard by many commenting parties, including Polar Communications at p. 10; Puerto Rico at pp. 3, 4; Rural Independents at p. 7; Sprint at p. 4; AMTA at p. 8; RAM Mobile Data at pp. 1, 2.

between the eligibility for SMR and the 220 MHz radio service. However, just as wireline carriers have been specifically allowed to offer new PCS services (both broadband and narrowband), they should likewise be allowed to offer new 220 MHz radio services. To preclude wireline carriers, or in fact any CMRS provider, from offering radio service in the 220-222 MHz band, would disserve the public interest and inhibit the development of competition in this market. As very aptly stated by SNET Mobility (at pp. 5, 6), as with PCS, wireline carriers can quickly allocate resources, including existing infrastructure, into wireless services that will speed deployment of services, produce innovative service offerings, promote competition and produce competitive rates for consumers. Moreover, current development of the fully competitive narrowband PCS market (a service somewhat akin to the 220 MHz radio service), uninhibited by artificial and unnecessary eligibility restrictions, should serve as a guide for the development of the 220 MHz radio service market. Both the record and the potential for public benefit supports the Commission's immediate elimination of this prohibition.

II. EXISTING INTERCONNECTION AND ACCOUNTING SAFEGUARDS ARE SUFFICIENT TO ASSURE THAT WIRELINE CARRIERS DO NOT DISCRIMINATE OR ACT IN AN ANTICOMPETITIVE MANNER IN THE PROVISION OF SMR OR 220 MHZ RADIO SERVICE

A number of parties to this proceeding are in agreement that existing regulatory safeguards, short of full structural separation requirements, are sufficient to guard against any

possible discriminatory or anticompetitive behavior on the part of wireline carriers in the provision of SMR or 220 MHz radio service.⁷ The comments of USTA (at pp. 3, 4) appropriately summarize the opinions of many parties in this area: (1) there is no need to impose additional accounting safeguards or require wireline carriers to provide SMR and other mobile services only through a separate subsidiary; (2) the FCC has already determined that separate subsidiaries are not in the public interest and should not be used to deny a firm's ability to utilize economies of scope in the provision of telecommunications services; (3) the FCC has already decided that exchange carrier provision of PCS would not require the establishment of separate subsidiaries; and (4) the FCC should not impose any regulations which facilitate disparate treatment of wireline carriers if it hopes to encourage the public interest benefits which can be realized in a competitive mobile services market; imposition of these types of regulations would certainly undermine the FCC's intent in lifting the wireline prohibition on SMR, commercial 220 MHz mobile services and dispatch service licenses.

While the comments of AMTA, Nextel and the Joint Commenters take a focus different from the majority (each urge the Commission to be vigilant and strictly enforce existing

⁷See Pacific Bell, Nevada Bell and Pacific Bell Mobile Services at pp. 4, 5; Polar Communications at pp. 10, 11; Puerto Rico at pp. 3, 4; Rural Independents at p. 7; TDS at p. 6; CTIA at pp. 13, 14; SNET Mobility at pp. 6, 7; RAM Mobile Data at pp. 1-3; NYNEX pp. 6, 7.

interconnection and accounting provisions),⁸ none of these parties suggests the need to impose additional safeguards or require full structural separation as a means to guard against anticompetitive behavior by wireline entities entering the SMR marketplace. Current market conditions and existing regulatory safeguards will effectively prevent wireline carriers from engaging in anticompetitive activities, including offering discriminatory interconnection arrangements and cross-subsidizing services.⁹ No additional safeguards are necessary.

III. THE PROHIBITION ON COMMON CARRIER PROVISION OF DISPATCH SERVICE SHOULD BE ELIMINATED

An overwhelming majority of commenting parties agree with SBC that the prohibition on common carrier provision of dispatch services (which applies to cellular carriers, as well) should be eliminated immediately and in its entirety.¹⁰ Many of these parties advanced arguments similar to those made by SBC in its Comments, namely: (1) Congress has given the FCC the discretion to terminate the dispatch prohibition,¹¹ (2) the

⁸See AMTA at p. 8; Nextel at p. 6; Joint Commenters at p. 4.

⁹In fact, as pointed out by NYNEX (at pp. 3, 4), wireline carriers, such as Southwestern Bell and U S West, have been able to bring new and innovative SMR services to their customers while operating SMR systems pursuant to waivers. NYNEX goes on to say that these benefits were not vitiated by anticompetitive consequences.

¹⁰The dispatch prohibition was adopted years ago to ensure that common carriers did not misuse frequencies by devoting them to dispatch.

¹¹See ALLTEL Mobile Communications at p. 3; Bell Atlantic Mobile Systems at p. 5; BellSouth at pp. 15, 16; NYNEX at p. 9; AirTouch at p. 2.

dispatch prohibition is outdated and unnecessary in the current regulatory and competitive environment,¹² (3) lifting the prohibition could not logically have any adverse impact on competition in the market and, in fact, would promote competition and customer choice,¹³ (4) it makes no sense to preclude cellular providers from offering dispatch services since SMR providers can compete directly with cellular providers and are not precluded from offering dispatch services; i.e., the "regulatory parity" argument,¹⁴ and (5) the public would benefit by the entry of experienced wireless services providers who could bring dispatch services to the public in an efficient manner.¹⁵

Other persuasive arguments for eliminating the common carrier ban are advanced in certain of the comments. For instance, East Otter Tail argues (at p. 11) that the ban on common carrier provision of dispatch service must be eliminated in order that: (1) rural telephone companies may compete effectively in rural SMR markets and (2) unmet needs on the part of certain customers will be satisfied with reasonably priced

¹²See ALLTEL Mobile Communications at p. 3, 4; McCaw Cellular Communications at pp. 1, 2; Rochester Telephone Cellular Holding Corporation at p. 3; PCIA at p. 2.

¹³See Century Telephone at p. 11; TDS at p. 7; Bell Atlantic Mobile Systems at p. 6; CTIA at p. 7; SNET Mobility at p. 8; PCIA at p. 2; NYNEX at pp. 8, 9; AirTouch at p. 3.

¹⁴See BellSouth at pp. 15, 16; Century Telephone at p. 11; TDS at p. 7; PCIA at p. 2, 3; AirTouch at p. 2; East Otter Tail at p. 6.

¹⁵See BellSouth at p. 16; Century Telephone at p. 11; GTE at pp. 6, 7; ALLTEL Mobile Communications at pp. 3, 4; PCIA at pp. 2, 3; NYNEX at pp. 8, 9; AirTouch at p. 3.

dispatch services. Similar arguments were made by other commenting parties.¹⁶ This general theme of allowing all common carriers the opportunity to provide dispatch services as a way to meet the needs of their customers is consistent with the views expressed by many of the commenters and is strongly supported by SBC. Only because of a misguided and outdated regulatory mandate are dispatch services unavailable in certain rural areas. Elimination of this prohibition will allow cellular carriers (and indeed all common carriers) the opportunity to give their customers the service they desire.¹⁷

Further, Bell Atlantic Mobile Systems argues (at p. 5) that there is no technical justification for continuing the prohibition on dispatch services. Recent technical developments, including digitalization, have eliminated any conceivable justification for maintaining the dispatch prohibition because common carriers can offer dispatch service without compromising use of common carrier frequencies. Certainly, cellular common carriers are extremely sensitive to the need for increased spectrum efficiency and constantly work toward that end. Continuing to base the dispatch prohibition on the potential misuse of spectrum by cellular common carriers is totally unfounded and without basis, as experience in the cellular industry has illustrated.

¹⁶See Polar Communications at p. 11; Rural Cellular Association at pp. 2, 3; AirTouch at p. 3.

¹⁷See Rural Cellular Association at pp. 2, 3.

Lastly, SBC would rebut the comments of certain parties on several different issues. First, SBC opposes those parties who urge the FCC to either defer elimination of the dispatch prohibition until the end of the statutorily-mandated three-year transition period from private carrier to CMRS status, August 10, 1996,¹⁸ or retain the prohibition entirely.¹⁹ Since its inception, the dispatch service industry has been protected by statutory and regulatory provisions from competitive entry by common carriers. To continue this artificial protection would neither be equitable nor in the public interest. Indeed, as ALLTEL argues (at p. 3), the objectives of the Budget Act require the elimination of the present restriction. Or, as stated by other parties, delay would: (1) only preserve a barrier to entry that the Notice acknowledges is "outdated," and impede the growth of competition (Bell Atlantic at pp. 6, 7); (2) merely protect a single ESMR company at the expense of promoting competition itself (AirTouch at p. 4); and (3) deprive rural Americans of much-needed service under the guise of protecting existing dispatch serviced providers that do not even operate in rural areas (Rural Cellular Association at p. 4). SBC agrees with those parties who believe the prohibition should be immediately removed and urges the Commission to act expeditiously to this end.

¹⁸See AMTA at pp. 11, 12; Geotek Communications at pp. 5, 6; Nextel at pp. 6, 7;

¹⁹See AMTA at p. 10, SMR WON at pp. 18-22; E.F. Johnson at p. 2; Joint Commenters at pp. 6, 7; NABER at pp. 5, 6.

Second, the FCC should reject the suggestions of certain parties that restrictions (either through precluding a cellular provider from offering dispatch service over its cellular system²⁰ or requiring the provision of dispatch service on a secondary basis with the cellular service²¹) should be placed on the ability of cellular providers to offer dispatch services. All cellular common carriers should be allowed the flexibility to use their assigned spectrum in a manner they believe to be most efficient and most appropriate to meet their customers' needs, without unnecessary regulatory restrictions. As Bell Atlantic so aptly notes (at p. 7), either of these suggestions would impose unnecessary regulatory burdens.²² Moreover, the FCC did not impose any such limits on Part 24 PCS licensees, but left those licensees free to provide any mobile service. The Commission cannot restrict only Part 22 licensees without violating the goal of regulatory symmetry. SBC concurs with the thoughts of Bell Atlantic and urges the Commission to completely eliminate the dispatch prohibition while not imposing any unnecessary restrictions that would be inconsistent with its overall goal of regulatory parity for CMRS providers.

In a final issue relating to dispatch services, SBC

²⁰See Geotek Communications at pp. 3, 4; SMR WON at p. 22; E.F. Johnson at pp. 3,4; NABER at p. 7.

²¹See AMTA at p. 12.

²²Similar comments opposing adoption of a limitation on the amount of spectrum or capacity for dispatch use on cellular systems were voiced by AirTouch at pp. 4, 5.

would reiterate the well-stated arguments of AirTouch (at p. 4) which address the cross subsidy and price discrimination concerns raised by the Commission in its Notice and discussed by at least one commenting party.²³ AirTouch counters that since cellular providers do not have market power in CMRS, such concerns are misplaced. As prices are set by competitive market forces, there is no incentive or ability to subsidize dispatch service prices with "monopoly profits" from common carrier services because there are no monopoly profits. Instead, provision of dispatch services over cellular networks would create pro-competitive economies of scope.

IV. CONCLUSION

The FCC should not allow the record in this proceeding to again become stale, as in the past, and should strive to conclude this proceeding without delay. For the myriad of reasons stated by a number of parties, existing wireline and common carrier prohibitions on the provision of SMR, 220 MHz radio service and dispatch services should be eliminated immediately. SBC urges the Commission to act expeditiously to eliminate these prohibitions and allow a competitive wireless market to fully develop to the benefit of the public and

²³See AMTA at p. 11.

consistent with the regulatory parity objectives envisioned by Congress.

Respectfully submitted,

SOUTHWESTERN BELL CORPORATION

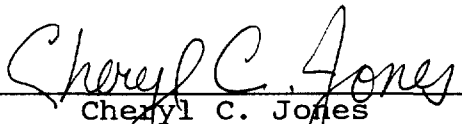
BY: Mary W. Marks
ROBERT M. LYNCH
MARY W. MARKS
175 E. HOUSTON
ROOM 1262
SAN ANTONIO, TX 78205
(210) 351-3478

COUNSEL FOR SOUTHWESTERN BELL
CORPORATION

October 20, 1994

CERTIFICATE OF SERVICE

I, Cheryl C. Jones, hereby certify that copies of Southwestern Bell Corporation's Reply Comments have been served by first class United States mail, postage prepaid, on the parties listed on the attached.


Cheryl C. Jones

October 20, 1994

Carolyn C. Hill, Esq.
Federal Regulatory Counsel
ALLTEL Corporate Services, Inc.
655 15th Street, N.W., Ste. 220
Washington, DC 20005

Elizabeth R. Sachs, Esq.
Lukas McGowan Nace & Gutierrez
American Mobile Telecommunications
Association, Inc.
1819 H Street, N.W., Ste. 700
Washington, DC 20006

Alan R. Shark, President
Jill M. Lyon, Esq.
American Mobile Telecommunications
Association, Inc.
1150 18th Street, N.W., Ste. 250
Washington, DC 20036

John T. Scott, III, Esq.
Crowell & Moring
Bell Atlantic Mobile Systems, Inc.
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

William B. Barfield, Esq.
Jim O. Llewellyn, Esq.
Bellsouth Corporation
1155 Peachtree Street, N.E.
Atlanta, GA 30309-3610

Charles P. Featherstun, Esq.
David G. Richards, Esq.
Bellsouth Corporation
1133 21st Street, N.W.
Washington, D.C. 20036

Michael F. Altschul, Esq.
Vice President, General Counsel
Cellular Telecommunications Industry
Association
1250 Connecticut Avenue, NW
Suite 200
Washington, D.C. 20036

W. Bruce Hanks
President - Telecommunications
Services
Century Telephone Enterprises, Inc.
100 Century Park Drive
Monroe, Louisiana 71203

John A. Pendergast, Esq.
Elizabeth A. Latham, Esq.
Blooston, Mordkofsky, Jackson
& Dickens
East Otter Tail Telephone Company
2120 L Street, N.W., Suite 300
Washington, D.C. 20037

Michael S. Hirsch
Vice President-External Affairs
Geotek Communications, Inc.
1200 19th Street, N.W., #607
Washington, D.C. 20036

Andre J. Lachance, Esq.
GTE Service Corporation
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

Frederick J. Day, Esq.
Industrial Telecommunications
Association, Inc.
1110 N. Glebe Road, Suite 500
Arlington, VA 22201-5720

Russell H. Fox, Esq.
Lauren S. Drake, Esq.
Gardner, Carton & Douglas
E.F. Johnson Company
1301 K Street, N.W.
Suite 900, East Tower
Washington, D.C. 20005

Cathleen A. Massey, Esq.
Senior Regulatory Counsel
McCaw Cellular Communications, Inc.
1150 Connecticut Aven., N.W.
Washington, D.C. 20036

Katherine M. Holden, Esq.
Wiley, Rein & Fielding
McCaw Cellular Communications, Inc.
1776 K Street, N.W.
Washington, D.C. 20006

David E. Weisman, Esq.
Alan S. Tilles, Esq.
Meyer, Faller, Weisman and
Rosenberg, P.C.
National Association of Business and
Educational Radio, Inc.
4400 Jenifer Street, N.W.
Suite 380
Washington, D.C. 20015

Mary McDermott, Esq.
Vice President and General Counsel
Linda Kent, Esq.
Associate General Counsel
United States Telephone Association
1401 H Street, NW, Suite 600
Washington, D.C. 20005

James P. Tuthill, Esq.
Betsy Stover Granger, Esq.
Pacific Bell, Nevada Bell, Pacific
Bell Mobile Services
140 New Montgomery St., Rm 1525
San Francisco, CA 94105

James L. Wurtz, Esq.
Pacific Bell, Nevada Bell, Pacific
Bell Mobile Services
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Mark J. Golden
Acting President
Personal Communications Industry
Association
1019 Nineteenth Street, N.W.
Suite 1100
Washington, D.C. 20036

John A. Prendergast
Gerard J. Duffy
Elizabeth A. Latham
Blooston, Mordkofsky, Jackson
& Dickens
Polar Communications Mutual Aid
Corporation
2120 L Street, N.W., Suite 300
Washington, D.C. 20037

Jonathan L. Wiener, Esq.
Daniel S. Goldberg, Esq.
Goldberg, Godles, Wiener & Wright
RAM Mobile Data USA Limited
Partnership
1229 Nineteenth Street, N.W.
Washington, D.C. 20036

Caressa D. Bennet
Regulatory Counsel
Rural Cellular Association
1831 Ontario Place, NW
Suite 200
Washington, DC 20009

Raymond J. Kimball, Esq.
Jocelyn R. Roy
Ross & Hardies
SMR Won
888 16th St., NW
Suite 400
Washington, DC 20006

Peter J. Tyrrell, Esq.
SNET Mobility, Inc.
227 Church Street
Room 1021
New Haven, CT 06510

Joe D. Edge, Esq.
Elizabeth A. Marshall, Esq.
Drinker Biddle & Reath
Puerto Rico Telephone Company
901 Fifteenth Street, N.W.
Washington, D.C. 20005

Michael J. Shortley, III
Attorney for Rochester Tel
Cellular Holding Corporation
180 South Clinton Avenue
Rochester, New York 14646

Stephen G. Kraskin, Esq.
Margaret D. Nyland, Esq.
Kraskin & Associates
The Rural Independents
2120 L Street, N.W.
Suite 520
Washington, D.C. 20037

Jean L. Kiddoo
Shelley L. Spencer
Swidler & Berlin, CHTD.
SNET Mobility, Inc.
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007

Jay C. Keithley, Esq.
Leon M. Kestenbaum, Esq.
Sprint Corporation
1850 M Street, N.W.
Suite 1100
Washington, D.C. 20036

Kevin C. Gallagher, Esq.
Sprint Corporation
8725 Higgins Road
Chicago, IL 60631

Craig T. Smith, Esq.
Sprint Corporation
P.O. Box 11315
Kansas City, MO 64112

George Y. Wheeler, Esq.
Peter M. Connolly, Esq.
Koteen & Naftalin
Telephone and Data Systems, Inc.
1150 Connecticut Avenue, N.W.
Suite 1000
Washington, D.C. 20036